

1 THE HONORABLE RICARDO S. MARTINEZ  
2  
3  
4  
5  
6  
7  
8

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 SPEARMAN CORPORATION  
10 MARYSVILLE DIVISION and  
11 SPEARMAN CORPORATION KENT  
12 DIVISION,  
13

Plaintiffs,

v.

14 THE BOEING COMPANY,  
15

Defendant.

16 THE BOEING COMPANY,  
17

Counterclaim and Third-  
Party Plaintiff,

v.

18 SPEARMAN CORPORATION and  
19 SPEARMAN CORPORATION KENT  
20 DIVISION,  
21

Counterclaim Defendant

22 ALEXANDER SPEARMAN, an individual,  
23

Third-Party Defendant.

No. 2:20-cv-00013 RSM

STIPULATED MOTION REGARDING  
DEPOSITION DESIGNATIONS

AND ORDER

NOTE ON MOTION CALENDAR:  
Thursday, February 23, 2023

24  
25  
26  
STIPULATED MOTION AND  
ORDER REGARDING DEPOSITION DESIGNATIONS  
(No. 2:20-cv-00013)

Error! Unknown document property name.

Perkins Coie LLP  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

## STIPULATED MOTION

The parties have exchanged deposition designations and counter-designations, and have exchanged potential objections to same. However, the parties may not present all this testimony, in part because of issues yet to be decided on pending motions in limine and uncertainty as to what will be presented at trial by either party. The parties are interested in avoiding having to meet and confer regarding objections to deposition testimony that may never actually be presented. More importantly, the parties do not want to burden the court with objections to deposition designations that may never be utilized and believe that they may be able to largely resolve any objections closer to the time those designations are due to be presented to the jury. However, the parties recognize that, pursuant to Local Rule 32(e), deposition designations and objections thereto are to be filed with the Court at the time of lodging the proposed Pretrial Order. The parties jointly here request relief from the deadline in Rule 32(e) and leave to file deposition designations and objections thereto as follows:

1. Final deposition designations (with corresponding counter designations and objections) will be served by 5 pm three court days before they may be presented to the jury.
  2. The other party will respond by 5 pm the following day and the parties will negotiate and submit objections (if any) to the court for resolution that evening for the court's decision the following day.
  3. The video will then be revised and available for presentation to the jury on the following day.

1 RESPECTFULLY SUBMITTED this 23rd day of February, 2023.  
2  
3

4 LANE POWELL PC  
5  
6

7 By: s/ David Schoeggl  
8

9 David Schoeggl, WSBA No. 13638  
10 Callie A. Castillo, WSBA No. 38214  
11 Telephone: 206.223.7000  
12 schoeggld@lanepowell.com  
13 castilloc@lanepowell.com  
14 *Attorneys for Plaintiffs*

15 PERKINS COIE LLP  
16  
17

18 By: s/ David J. Burman  
19

20 David J. Burman, WSBA No. 10661  
21 Susan E. Foster, WSBA No. 18030  
22 Nicholas P. Gellert, WSBA No. 18041  
23 David S. Steele, WSBA No. 45640  
24 Telephone: 206.359.8000  
25 DBurman@perkinscoie.com  
26 SFoster@perkinscoie.com  
NGellert@perkinscoie.com  
DSteele@perkinscoie.com  
*Attorneys for Defendant / Counterclaimant*  
*The Boeing Company*

19 MURPHY PEARSON BRADLEY & FEENEY  
20  
21

22 By: s/Nicholas C. Larson  
23

24 Nicholas C. Larson, WSBA No. 46034  
25 Merri N. Engler, *pro hac vice*  
26 Telephone: 206.219.2008  
nlarson@mpbf.com  
nengler@mpbf.com  
*Attorneys for Counterclaim Defendants*  
*Spearman Corporation and Alex Spearman*

## ORDER

Based on the above Stipulated Motion, the Court does hereby ORDER:

The Stipulated Motion is granted.

DATED this 24<sup>th</sup> day of February, 2023.

  
RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND ORDER  
REGARDING DEPOSITION DESIGNATIONS  
(No. 2:20-cv-00013) – 3  
Error! Unknown document property name.

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000